

Eric I. Abraham
William P. Murtha
HILL WALLACK LLP
21 Roszel Road
Princeton, NJ 08543
Telephone: (609) 924-0808
Facsimile: (609) 452-1888
eabraham@hillwallack.com
wmurtha@hillwallack.com

Douglas R. Weider
GREENBERG TRAUIG LLP
500 Campus Drive
Suite 400
Florham Park, NJ 07932
(973) 360-7900
weiderd@gtlaw.com

*Attorneys for Defendants Annora Pharma
Private Limited, Grace Consulting Services,
Inc., Hetero Labs Limited, and Hetero USA,
Inc.*

*Attorneys for Defendants
Teva Pharmaceuticals, Inc., and Teva
Pharmaceuticals USA, Inc*

James S. Richter
MIDLIGE RICHTER, LLC
645 Martinsville Road
Basking Ridge, New Jersey 07920
(908) 626-0622
Email: jrichter@midlige-richter.com

*Attorneys for Defendants Lupin Limited
and Lupin Pharmaceuticals, Inc*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CATALYST PHARMACEUTICALS, INC. and
SERB SA,

Plaintiffs,

v.

TEVA PHARMACEUTICALS, INC. and
TEVA PHARMACEUTICALS USA, INC.,

Defendants.

C.A. No. 2:23-cv-01190-MEF-JRA

CATALYST PHARMACEUTICALS, INC. and
SERB SA,

C.A. No. 2:23-cv-01194-MEF-JRA

Plaintiffs,

v.

ANNORA PHARMA PRIVATE LIMITED,
GRACE CONSULTING SERVICES, INC.,
HETERO LABS LIMITED, and HETERO USA,
INC.,

Defendants.

CATALYST PHARMACEUTICALS, INC. and
SERB SA,

Plaintiffs,

v.

LUPIN LTD. and LUPIN
PHARMACEUTICALS, INC.,

Defendants.

C.A. No. 2:23-cv-01197-MEF-JRA

**DEFENDANTS' NOTICE OF MOTION TO STRIKE PORTIONS OF
PLAINTIFFS' RESPONSIVE *MARKMAN* SUBMISSIONS**

PLEASE TAKE NOTICE that on May 20, 2024 at 9:00 a.m. or as soon thereafter as counsel may be heard, Greenberg Traurig, LLP, attorneys for Defendants Teva Pharmaceuticals, Inc. and Teva Pharmaceuticals USA, Inc. (collectively, "Teva"), Hill Wallack LLP, attorneys for Defendants Annora Pharma Private Limited, Grace Consulting Services, Inc., Hetero Labs Limited, and Hetero USA, Inc. (collectively, "Hetero"), and Midlige Richter LLC, attorneys for Defendants Lupin Ltd. and Lupin Pharmaceuticals, Inc. (collectively, "Lupin") (collectively, "the Defendants") shall move to strike portions of Plaintiffs' Responsive *Markman* Submissions;

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon their accompanying Brief and Declaration of Alison King (and exhibits thereto). A proposed form of order is also submitted for the Court's consideration.

Dated: April 19, 2024

Respectfully submitted,

Of Counsel:

W. Blake Coblentz (*pro hac vice*) Aaron S.
Lukas (*pro hac vice*) **COZEN O'CONNOR**
1200 19th Street, NW
Washington, DC 20036
(202) 912-4800 wcoblentz@cozen.com
alukas@cozen.com

Keri L. Schaubert (*pro hac vice*)
COZEN O'CONNOR
3WTC 175 Greenwich St., 55th Fl.
New York, NY 10007
(212) 509-9400
kschaubert@cozen.com

Of Counsel:

Keith D. Parr (*pro hac vice*)
Nina Vachhani (*pro hac vice*)
Jacob C. Britz (*pro hac vice*)
LOCKE LORD LLP
111 South Wacker Drive
Chicago, IL 60606
(312) 443-0700

Zhibin Li
LOCKE LORD LLP
Brookfield Place, 200 Vesey Street
New York, New York 10281
646-217-7897

s/ Eric I. Abraham

Eric I. Abraham
William P. Murtha
HILL WALLACK LLP
21 Roszel Rd., P.O. Box 5226
Princeton, NJ 08543
(609) 924-0808
eabraham@hillwallack.com
wmurtha@hillwallack.com

*Attorneys for Defendants Annora Pharma
Private Limited, Grace Consulting Services,
Inc., Hetero Labs Limited, and Hetero USA,
Inc.*

s/ James S. Richter

James S. Richter
MIDLIGE RICHTER, LLC
645 Martinsville Road
Basking Ridge, New Jersey 07920
(908) 626-0622
Email: jrichter@midlige-richter.com

*Attorneys for Defendants Lupin Limited
and Lupin Pharmaceuticals, Inc.*

Of Counsel:

George C. Lombardi
Ivan M. Poullaos
Alison M. King
Brian L. O’Gara
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
(312) 558-5600

Sharon Lin
WINSTON & STRAWN LLP
1901 L Street NW
Washington, DC 20036
(202) 282-5000

s/ Douglas R. Weider

Douglas R. Weider
GREENBERG TRAURIG LLP
500 Campus Drive
Suite 400
Florham Park, NJ 07932
(973) 360-7900
weiderd@gtlaw.com

*Attorneys for Defendants
Teva Pharmaceuticals, Inc., and Teva
Pharmaceuticals USA, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of April, 2024 I caused the annexed Notice of Motion, along with the accompanying brief, the Declaration of Sharon Lin and the proposed form of Order to be served upon all counsel of record via the Court's ECF system.

Dated: April 19, 2024

/s/ Douglas R. Weider
Douglas R. Weider